

Document Page 1 of 3  
**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Tyshaan C. Williams

Debtor

CHAPTER 13

FREEDOM MORTGAGE CORPORATION

Movant

vs.

NO. 18-18016 JKF

Tyshaan C. Williams

Debtor

Scott Waterman, Esquire

Trustee

11 U.S.C. Sections 362 and 1301

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtor's residence is **\$21,089.64**, which breaks down as follows;

Post-Petition Payments: January 2019 to July 2019 at \$2,865.52

Fees & Costs Relating to Motion: \$1,031.00

**Total Post-Petition Arrears \$21,089.64**

2. Debtor has stated his intention to surrender the Secured Property to Movant.

3. As no response or opposition has been filed by co-debtor, Kimberly K. Williams, to Movant's Motion for Relief, Debtor takes no position as to Movant being granted relief from the co-debtor stay pursuant to 11 U.S.C. § 1301.

4. Debtor stipulates and agrees that, upon the Court's approval of this Stipulation, Movant shall be granted relief from the automatic stay to pursue its in rem State remedies as to the Secured Property.

5. Upon Court approval, Movant is also granted relief from the co-debtor stay pursuant to 11 U.S.C. § 1301 within this bankruptcy filing.

6. The parties agree that a facsimile signature shall be considered an original signature.

Date: July 9, 2019

By: /s/ Rebecca A. Solarz, Esquire  
Attorney for Movant

Date: July 10, 2019



David M. Offen, Esquire  
Attorney for Debtors

Date: July 10, 2019

/s/ Polly A. Langdon, Esquire, for  
Scott Waterman, Esquire  
Chapter 13 Trustee

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2019. However, the court retains discretion regarding entry of any further order.

\_\_\_\_\_  
Bankruptcy Judge  
Jean K. FitzSimon

SPOC TEAM  
FREEDOM MORTGAGE CORPORATION  
P.O. Box 50428  
Indianapolis, IN 46250-0401